

# EXHIBIT 1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

REUVEN GILMORE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action
	)	No. 01-00853 (GK)
THE PALESTINIAN INTERIM	)	
SELF-GOVERNMENT AUTHORITY, et al.,	)	
	)	
Defendants.	)	

---

VIDEOTAPED DEPOSITION OF

AVI ISSACHAROFF

BEFORE THE HONORABLE JUDGE YAAKOV BETZALEL (Ret.)

JERUSALEM, ISRAEL

JUNE 19, 2012

REPORTED BY: BRENDA MATZOV, CA CSR NO. 9243

12:19:18 1 MR. STEINER: Okay. With the understanding  
12:19:18 2 that the witness will be advised by his counsel not  
12:19:21 3 to divulge any sources outside what's delineated  
12:19:27 4 on page 31 --  
12:19:30 5 MR. HALLER: Seventy --  
12:19:30 6 MR. STEINER: -- 71 [sic], Exhibit 31 --  
12:19:32 7 thank you --  
12:19:32 8 MR. HALLER: Seventy-eight.  
12:19:33 9 MR. STEINER: -- 78, Exhibit 31, I'll  
12:19:33 10 therefore limit the scope of that question to  
12:19:36 11 specifically the first attack that is spoken about  
12:19:39 12 on page 78, Exhibit 31. So --  
12:19:42 13 MS. LIEBLICH: Sorry. I meant that he  
12:19:45 14 should not disclose any resource [sic], only what  
12:19:51 15 is said here obviously.  
12:19:54 16 MR. STEINER: Right.  
12:19:56 17 MS. LIEBLICH: As long as he has other  
12:19:58 18 sources --  
12:19:58 19 MR. STEINER: That's -- that's what I'll limit  
12:19:58 20 it to.  
12:19:58 21 MS. LIEBLICH: -- this is for him to answer.  
12:19:58 22 MR. STEINER: Okay. That -- that's what I'm  
12:19:58 23 going to limit it to.  
12:20:02 24 Q. BY MR. STEINER: So can you tell us what the  
12:20:03 25 first attack you speak about in this chapter was?

12:20:08 1 A. An attack in the national security office --  
12:20:23 2 THE INTERPRETER: "National Insurance."  
12:20:23 3 THE WITNESS: Not --  
12:20:23 4 THE INTERPRETER: "National Insurance."  
12:20:25 5 THE WITNESS: "National Insurance." Sorry.  
12:20:26 6 -- National Insurance office in East  
12:20:27 7 Jerusalem. And during that attack, they killed  
12:20:32 8 Esh Chodesh Gilmore.

12:20:36 9 Q. BY MR. STEINER: And who did you speak  
12:20:38 10 to relating to that attack?

12:20:42 11 MR. ROCHON: Objection.

12:20:46 12 Q. BY MR. STEINER: Who can you tell us about  
12:20:47 13 that you spoke to relating to that attack?

12:20:48 14 MR. ROCHON: Well, the problem is --

12:20:49 15 MR. HALLER: Can we take a break? Can we  
12:20:50 16 take a one-minute break?

12:20:52 17 MR. ROCHON: Yeah.

12:20:52 18 MR. HALLER: One-minute break.

12:20:54 19 MR. ROCHON: That's fine.

12:20:55 20 THE VIDEOGRAPHER: Going off the record at  
12:20:56 21 12:21.

12:20:59 22 (Recess from 12:21 p.m. to 12:23 p.m.)

12:21:14 23 THE VIDEOGRAPHER: Back on record at 12:23.

12:24:17 24 Q. BY MR. STEINER: Did there come a point of  
12:24:20 25 time when you had a conversation with an individual

12:24:23 1 named Abdel Karim Aweis relating to the attack that  
12:24:24 2 you just mentioned of Mr. Gilmore?

12:24:28 3 A. Yes.

12:24:29 4 Q. When did you have -- how many times did you  
12:24:31 5 speak to that individual, Mr. Aweis?

12:24:34 6 A. Once.

12:24:35 7 Q. When did that conversation occur?

12:24:38 8 A. 2004.

12:24:40 9 Q. Can you narrow it down in any more detail?

12:24:44 10 A. No.

12:24:44 11 Q. Do you know what season it was?

12:24:50 12 A. No.

12:24:52 13 Q. And can you tell us what it is that he told  
12:24:55 14 you during that conversation?

12:24:58 15 A. Well, if my memory's right and according  
12:25:03 16 to what is written in the book, he described the way  
12:25:07 17 that this man, Muhanad Abu Halaweh, called him and told  
12:25:13 18 him that he made an attack on the National Insurance  
12:25:21 19 office and asked his advice of what to do, more or less.  
12:25:28 20 Should we -- "I want to take responsibility for what  
12:25:32 21 happened over there. What name should I use for that?"

12:25:43 22 Q. What else did he tell you regarding that  
12:25:46 23 attack in the conversation you had with him?

12:25:55 24 MR. ROCHON: Just a -- if the witness could  
12:25:58 25 just indicate an answer what he remembers from his

12:26:00 1 memory. And I see him reading the chapter. If he's  
12:26:04 2 able to distinguish between those, we would ask  
12:26:06 3 counsel --

12:26:06 4 MR. STEINER: You certainly can do that on  
12:26:06 5 cross-examination, if you like. And the record can  
12:26:08 6 reflect that the witness is glancing down at Exhibit 31  
12:26:12 7 as he gives his answer.

12:26:14 8 MR. ROCHON: Okay. As long as the record  
12:26:15 9 reflects that, that's fair.

12:26:40 10 THE WITNESS: He described the way that he  
12:26:43 11 contacted Ahmed Al-Faransi -- that's the nickname,  
12:26:49 12 Al-Faransi -- Barghouti.

12:26:51 13 Q. BY MR. STEINER: When you say "he," do you  
12:26:51 14 mean Aweis?

12:26:52 15 A. Abdel Karim Aweis. Yes.

12:26:54 16 Q. And did he tell you anything else about the  
12:26:57 17 attack? Did he tell you what Halaweh did?

12:27:02 18 A. Well, it was four years after the incident.  
12:27:03 19 So it was known that he killed a man.

12:27:06 20 Q. And did you hear that from Aweis as well?  
12:27:10 21 Did Aweis tell you that?

12:27:11 22 A. That -- that Abu Halaweh --

12:27:13 23 Q. Yes.

12:27:15 24 A. -- killed a man?

12:27:16 25 Q. Yes.